

UNITED STATES DISTRICT COURT PRIVATE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 07 CR 795
)	
ROBERT FLETCHER ET AL.,)	Judge Elaine Bucklo
)	
Defendants.)	

**DEFENDANT FLETCHER'S AGREED MOTION
TO EXTEND PRETRIAL MOTION DEADLINES AND STATUS**

Defendant Robert Fletcher ("Fletcher"), by his attorney, respectfully requests that this Court extend by twenty-one days the deadlines to file and respond to Pretrial Motions and for the status hearing herein. In support thereof, Fletcher states as follows:

1. Defendants Fletcher and Michael Courtney are charged by Indictment with various offenses relating to two real estate transactions.

2. On March 12 2008, this Court set the following deadlines with respect to this matter: Rule 16 conference to be held by March 19; Pretrial Motions due by March 30; Responses to Pretrial Motions due by April 9; status hearing on April 4 at 10:00am.

3. Fletcher respectfully requests that this Court enter an Order extending the foregoing deadlines by 21 days.¹ The government has not yet produced its discovery materials in this case but anticipates doing so no later than early next week. The discovery in this case will be somewhat voluminous in that this case arises from two real estate transactions and the government's production apparently will contain a fair number of

¹ The current due date for Pretrial Motions, March 30, falls on this Sunday, thereby rendering the effective due date March 31. Fed. R. Crim. P. 45(a)(3). Fletcher seeks an extension of twenty-one days from the effective due date.

documents from these transactions. Once these materials have been produced, it will then take defense counsel some time to review these materials and determine whether or not to file any Pretrial Motions.

4. Fletcher accordingly requests that this Court enter an Order establishing the following new dates: Pretrial Motions due on or before April 21; Responses to Pretrial Motions due on or before April 30; and status on April 25.

5. Counsel for Fletcher (Timothy P. O'Connor) has spoken to counsel for the United States (Steven Bloch) and counsel for codefendant Michael Courtney (Michael Clancy) about this Motion and both of these counsel have informed counsel for Fletcher that they agree to this Motion.

6. Defendants further agree to exclude time through the extended date for status proposed herein.

7. Fletcher respectfully submits that granting this Motion will not result in any significant delay of these proceedings and is in the interests of justice because it will result in the parties having the necessary amount of time to prepare and submit Pretrial Motions and related filings in this matter.

WHEREFORE, Defendant Robert Fletcher respectfully requests that this Court extend by approximately twenty-one days the deadlines to file and respond to Pretrial Motions and for the status herein.

Date: March 26, 2008

Respectfully submitted,

ROBERT FLECTHER

By: s/ Timothy P. O'Connor
One Of His Attorneys

Timothy P. O'Connor
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20 South Clark Street
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the foregoing
DEFENDANT FLETCHER'S AGREED MOTION TO EXTEND PRETRIAL MOTION
DEADLINES AND STATUS to be served upon

AUSA Steven Bloch
United States Attorney's Office
219 S. Dearborn St.
Chicago, IL 60604

Terrence Gillespie
Genson & Gillespie
Suite 1420
53 W. Jackson Blvd.
Chicago IL 60604

Michael Clancy
Attorney At Law
Suite 1401
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by electronic service through the court's ECF filing system on this 26th day of March, 2008.

s/Timothy P. O'Connor